

Atkociunas, Paul

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US EPA RECORDS CENTER REGION 5



457697

**From:** Atkociunas, Paul  
**Sent:** Friday, May 31, 2013 12:26 PM  
**To:** 'Brian Harrington'  
**Cc:** Kaiser, Steven  
**Subject:** RE: Former Western Tar, Terre Haute, IN

Brian,

EPA response to Keramida's April 1, 2013 letter regarding the Former Western Tar Products Site.

Thanks,

Paul Atkociunas  
Federal On-Scene Coordinator  
US EPA Region 5  
77 West Jackson Boulevard (SE-5J)  
Chicago, Illinois 60604  
Phone: 312-886-7502  
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**General Comment 1:** If interim actions (i.e., installation of plastic sheet piling, a French drain, or other collection methods) are deemed infeasible and/or impractical in advance of the proposed removal activities, the site should be regularly inspected to check for coal tar seeps into the Wabash River. If coal tar seeps are observed during inspection, the coal tar must be picked up and stored appropriately for later disposal. Also shallow waters of the river should be inspected for coal tar pieces. If coal tar pieces are observed in river bank waters they should be picked up. Provide schedule for regular inspections.

**General Comment 2:** Additional information is requested regarding the "chip and seal" product that was applied at the Site to ensure that the product was applied in accordance with the manufacture's specified directions. Was this product applied directly to a soil surface? A coal tar product that is applied to seal asphalt parking lots and driveways is not comparable to a product applied to the exposed ground surface. The material applied to a hard surface such as asphalt does not have an exposure route to humans via ingestion or dermal contact of particles. IDEM has developed soil direct contact screening levels that assume exposure to humans via ingestion, dermal contact, and inhalation of volatiles and particulates. The contaminants identified in soil samples at the Site contained elevated levels of carcinogenic PAHs that are harmful to human health via ingestion and/or dermal contact. When applied to the soil surface, soil particles coated with the material that contains carcinogenic PAHs may be ingested or absorbed through the skin of a human that comes into contact with the material. The site contaminants are hazardous substances recognized by IDEM and screening level have been developed for these chemicals. Per IDEM guidance, exceedance of a screening level means that further action is necessary. Such action might include remediation, risk management, and/or a demonstration utilizing appropriate lines of evidence that the risk characterization overstates the actual risk. Thus, contaminated soil at the Site in the "chip and seal" area requires delineation and evaluation of remedial approaches.

It is noted that step-out borings and delineation for contamination in the area of sampling locations TT-101 and KB-113 will be conducted during the removal activities.

Note that IDEM has updated their RISC soil direct contact closure levels. The 2013 screening levels can be found at: <http://www.in.gov/idem/6792.htm>

It is stated that "Confirmatory soil samples planned for the proposed excavation areas with not be collected from the "chip and seal" materials". As stated above, if the soil particles are loose and a route of human exposure is complete, soil concentrations must be in compliance with regulatory limits. Therefore, confirmatory samples should be collected.

The volume calculations and estimates are acceptable. In the event that capping of the Site is the preferred remedy, a remedial design for the cap would need to be prepared and submitted for EPA review.

**Specific Comment 1:** As previously noted, EPA does not agree that the "chip and seal" material does not warrant removal.

**Specific Comment 2:** The proposal to use GPR to identify native soils and fill areas appears to be acceptable. A certified report must be submitted for EPA review. Test pits are preferred over borings to increase the likelihood of identifying potential isolated fill areas.

**Specific Comment 4:** Visible tar pieces should be removed from the river as well as the shoreline during remedial activities.

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**From:** Brian Harrington [mailto:bharrington@keramida.com]  
**Sent:** Monday, March 25, 2013 9:56 AM  
**To:** Atkociunas, Paul  
**Subject:** RE: Former Western Tar, Terre Haute, IN

Thanks!

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**From:** Atkociunas, Paul [mailto:atkociunas.paul@epa.gov]  
**Sent:** Monday, March 25, 2013 10:44 AM  
**To:** Brian Harrington  
**Subject:** RE: Former Western Tar, Terre Haute, IN

Brian,

The email references two Attachment A's - th Work Plan to be submitted by CAVU Ops and the photolog.

The photo log can be located on the public web site  
[www.epaossc.org/westerntar](http://www.epaossc.org/westerntar)  
as the file name  
[Appendix A rev 43778APPA Photolog.pdf](#)

Thanks,  
Paul Atkociunas

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**From:** Brian Harrington [bharrington@keramida.com]  
**Sent:** Saturday, March 23, 2013 11:26 AM

**To:** Atkociunas, Paul  
**Subject:** Former Western Tar, Terre Haute, IN

Paul,

Per our conversation earlier this week, KERAMIDA has been authorized to proceed with a response to your December 20, 2011 comments to the Site Investigation Report, dated August 29, 2011, for the above referenced site. Your comments referenced Attachment A which wasn't attached. Please provide KERAMIDA a copy of Attachment A. We anticipate submitting the response sometime next week depending on when we receive Attachment A.

Thanks,

**Brian Harrington**  
**Vice President**  
**KERAMIDA Inc.**  
**Global EHS & Sustainability Services**  
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